

PROFILE OF ANTI-BRIBERY LAWS/ ENFORCEMENT IN SSA COUNTRIES

Country	Statutes	Agencies	Cases	African Union Convention on Preventing and Combating Corruption	United Nations Convention against Corruption	Whistleblower Protections	US state department Analysis 2009
Angola	Law of the High Authority Against Corruption, Penal Code 1886, Law of Crimes Against the Economy, Law on Access to Administrative Documents (but see Law on State Secrecy 2002, Law on National Security)	High Authority against Corruption, Office of the Ombudsman, Tribunal de Contas (Auditor)	On October 15, 2009, former governor of Bengo, Isalino Mendes, was found guilty of embezzling public funds; In September 2009, a foreign bridge-building company was convicted of foreign bribery with undisclosed Angolan ministers and officials dating back to 1990.	Signed	Ratified	None	To lower investment risks and provide greater assurance to investors, Angola needs greater progress toward good governance, the rule of law and diminished corruption. Senior officials are widely seen as corrupt, while the government's limited publication of accounting information fuels public suspicions. Angola, encouraged by the IMF, has invited major international accounting firms to conduct regular audits of its largest public companies. The 2002 Audit Law requires audits for all "large" companies, but the lack of a professional accounting oversight body has impeded enforcement. US firms operating in Angola are required to adhere to the Foreign Corrupt Practices Act.
Benin	Articles 166 to 183 of the Criminal Code, in the Criminal Procedures Code and in Articles 18, 19, 35 and 37 of the Beninese Constitution (in French).	The Observatoire de lutte contre la corruption (OLC, in French)	In 2006, a minister and a politician have been indicted and 27 judges have been charged for misappropriation of court fees. In 2007, President Yayi Boni ordered an audit of 60 state-run companies and also an investigation of Beninese embassies abroad.	Ratified	Ratified	None	President Yayi's government has demonstrated a high level of political will to combat corruption in Benin and has moved, in several high-profile cases, against corrupt government officials. Corruption remains a problem in the customs service, with government procurement, and in the judicial system. Investors may encounter numerous attempts to solicit bribes as they begin operations in Benin. While Benin lacks specific anti-corruption legislation, both the offer and receipt of a bribe are illegal in Benin and punishable by a penalty of up to ten years imprisonment.

Botswana	Corruption and Economic Crime Act.	DCEC - The Directorate on Corruption and Economic Crime	The very first Corruption Prevention assignment carried out by the Directorate which identified serious weaknesses in the management structure of a Public Company. Using this information, an investigation into complaints received was conducted and this resulted in the Chief Executive of the Public Company being prosecuted, convicted and imprisoned for offences under the Act.	No action	No action	Restricted	The Government of Botswana is seriously concerned about the increasingly detrimental effects of the growing crime rates which were seen to be limiting the country's development and affecting its social structures, depriving it of considerable revenue, and damaging the country's reputation. Since its inception, DCEC has earned itself respect locally and among those engaged in anti-corruption work elsewhere in the world., DCEC had been actively engaged in the formation of the Southern African Forum Against Corruption (SAFAC), the principal aims of which are to implement the protocol and facilitate training in anti-corruption disciplines. Corruption in Botswana is perceived as present but has not yet been viewed as an obstacle to investment and penalties of such acts are applied proportionately. While there remains a high tolerance for conflict of interest in government/private sector interaction, foreign investor complaints generally focus on the reputed inefficiency and/or unresponsiveness of mid- to low-level bureaucrats in government.
----------	------------------------------------	---	---	-----------	-----------	------------	---

Burkina Faso	Articles 154 to 159 of the Penal Code, Law No. 26 Concerning the Fight Against Money Laundering	Superior Authority of State Control (ASCE), National Ethics Committee (NEC), High Commission of Coordination for the Fight Against Corruption (HCFAC), State General Inspection (SGI), Autorité de Regulation des Marches Publics-ARMP(body to ensure transparency in the bidding process by monitoring the execution of all government contracts), Office of the Ombudsman, Auditor General	The 1998 assassination of investigative journalist and editor of the weekly newspaper <i>L'Indépendant</i> , Norbert Zongo, is still an unsolved case and represents a turning point in the public opinion about corruption and impunity in the country. At the time of his murder, Zongo was investigating a case connecting President Compaoré's brother to the torture and killing of his own chauffeur.	Ratified	Ratified	No report	Although Burkina Faso means "land of the honest men", Transparency International's Corruption Perceptions Index indicates that corruption is still a problem for this West African nation. The main challenges the country currently faces are poor access to information, a weak judiciary, limited enforcement powers of anti-corruption institutions, misappropriation of public funds, and lack of a separation of powers. Civil servants who most commonly engage in corruption include: members of the police force and gendarmerie, customs officials, political groups, justice officials, healthcare workers, educators, tax collectors, and the media. While the government has identified corruption as an obstacle to doing business, the World Bank ranked Burkina Faso as the fourth best Sub-Saharan African country in the area of corruption control, trailing only South Africa, Madagascar and Ghana.
--------------	---	--	---	----------	----------	-----------	--

Burundi	Penal Code	Anti-corruption Court, Cour des Comptes' (treasury departments within public institutions), 'Brigade Spéciale Anti-Corruption' (the Anti-Corruption Squad).	October 2009, Burundi's former ambassador to Kenya, Salvator Ntacobamaze, was charged with mismanagement and misappropriation of funds while on duty in Nairobi	Ratified	Ratified	Article 12 de la loi N°1/ 12 du 18 avril 2006 portant mesures de prévention et de répression de la corruption et des infractions connexes (measures for prevention and suppression of corruption and related offenses)	Officially, Burundi has a number of laws and regulations prohibiting corrupt practices such as bribery, nepotism, preferential hiring and promotion and embezzlement. In practice, these measures are rarely enforced. This is largely a result of an under-resourced and poorly trained police force and civil service; there is no evidence of any particular bias for or against foreign investors in the enforcement of these statutes. No major U.S. firms have specifically noted corruption as an obstacle to direct investment in Burundi, although corruption is seen as one of the typical hurdles to be overcome when doing business in the region. Corruption is most pervasive in Burundi in the government procurement sector; the purchase and sale of government property takes place in a non-transparent environment with frequent allegations of bribery and cronyism. Cabinet members, parliamentarians, and anyone appointed by presidential decree have immunity from prosecution on corruption charges, effectively insulating them from accountability.
---------	------------	---	---	----------	----------	--	---

Cameroon	Penal Code, Code of Penal Procedures 2005	National Anti-Corruption Commission (CONAC), National Agency for Financial Investigations, Superiour State Audit, Court of Auditors of the Supreme Court	On June 11, 2009, the Douala Court of Appeals sentenced Alphonse Siyam Siwe, former Minister of Energy and Water and Director-General of the Autonomous Port of Douala, and two other defendants for life imprisonment on embezzlement; the lower court had previously issued 30-year sentences. Among others accused in the case, one was sentenced to 25 years' imprisonment, eight to 15 years', and one to one year. In addition, the court reversed the Wouri Higher Courts' acquittal of seven defendants and sentenced six to 15 years' imprisonment and one to one year.	Signed	Ratified	None	Corruption is endemic in Cameroon. Cameroon regularly ranks among the most corrupt countries in both Transparency International's index of the private sector's perceptions of corruption and its survey of the public's experiences with corrupt activity. governance of the public procurement process remains problematic. Corruption is a criminal offense in Cameroon, and punishment can include imprisonment (5 years to life) and a fine (\$400 to \$4,000). Sectors with high corruption potential include government procurement, customs, and public health facilities.
Cape Verde	Penal Code, Anti-Money Laundering Pursuant to Law No. 17/VI/2002	High Authority against Corruption	In 2000, former Prime Minister was accused of embezzling approximately \$16,250 (2 million Cape Verdean escudos) in the privatization of ENACOL (a parastatal oil supply firm).	No action	Ratified	Protected	Official corruption carries a criminal penalty of up to 15 years' imprisonment. There were no new reports of government corruption during the year, but the World Bank's 2008 Worldwide Governance Indicators reflected that government corruption was a problem.

Central African Republic	Penal Code and Code of Criminal Procedure, Anti-Money Laundering and Terrorist Financing Act	National Committee to Fight Corruption	January 2008, A court in the Central African Republic's capital, Bangui, sent the director of a private newspaper to prison to await trial on criminal charges in connection with an editorial about a political scandal.	No action	Ratified	By law there is protection protected, however, not in practice.	The law provides criminal penalties for official corruption; however, the government did not implement these laws effectively, and officials often engaged in corrupt practices with impunity. Misappropriation of public funds and corruption in the government remained widespread. The World Bank's worldwide governance indicators reflected that government corruption was a severe problem.
Chad	Penal Code and the Penal Procedure Code (Ordinance n°12 ET 13/PR/MJ of 9 th June 1967), Anti-Corruption Act (Act n°044/PR/2000 of 16th February 2000)	Ministry of Moralization	The Textbook Affair- November 2009, a group of leading officials were accused of taking bribes when they put out a tender for school textbooks. In August 2009, Ministry of State Oversight stated that it had initiated 35 legal cases against 141 government officials charged with embezzlement and misappropriation of public funds during the year.	Signed	No action	Protected	Officials frequently engaged in corrupt practices. The World Bank's most recent Worldwide Governance Indicators reflected that corruption was a severe problem.

Comoros	Penal Code	Union Ministry of Justice	In June 2007 the government arrested several officials of the former regime on charges of corruption. Former government ministers of the union police were tried for stealing administrative property, convicted, sentenced to eight months in prison, and fined \$360 (147,000 Comoran Francs). Former secretary general Abdou was convicted on the same charge and sentenced to four months' imprisonment and fined \$480 (196,000 Comoran Francs).	Ratified	Signed	Restricted	Resident diplomatic, UN, and humanitarian agency workers reported petty corruption was commonplace at all levels of the civil service despite the government's anticorruption campaign.
Congo	Criminal Law	The Ethics & Corruption Commission	Two prominent anticorruption and human rights activists, Christian Mounzeo and Brice Mackosso, reported ongoing harassment during the year, following their arrest and convictions in 2006 on embezzlement charges that international organizations and foreign governments alleged were politically motivated. Mounzeo and Mackosso denied the charges and appealed their convictions-which, after an eight-month trial, included 12-month suspended sentences and fines equivalent to US \$600 (300,000 CFA)	Ratified	Ratified	Restricted	According to the World Bank's Worldwide Governance Indicators, government corruption was a severe problem, although the Bank and the International Monetary Fund noted that the government undertook significant reform measures to combat corruption. There was a widespread perception of corruption throughout government, including misuse of revenues from the oil and forestry sectors. Some local and international organizations claimed that government officials, through bribes or other fraud, regularly diverted revenues from these industries into private overseas accounts before the revenues were declared officially. Pervasive lower-level corruption included demands for bribes by security personnel, customs officials, and immigration personnel.

Côte d'Ivoire	Law No. 2005-554 Anti-money laundering, 2005, Criminal Code, Code of Public Procurement	The General Secretariat in charge of good governance, Board of State General Inspectors, Finance Ministry's Inspector General's Office, Cellule Nationale de Traitement des Informations Financieres-CENTIF (financial intelligence unit, responsible for investigating money laundering and terrorist financing)	June, 2006- Police in Côte d'Ivoire have arrested top officials of the Coffee and Cocoa Bourse (BCC), in a widening crackdown on fraud in the cocoa sector. The men are part of a list of 23 people charged with financial corruption by Côte d'Ivoire prosecutors. President Laurent Gbagbo ordered the probe in October 2007, after allegations of the embezzlement of more than 152 million euros, put aside to help develop the sector	Signed	Signed	Restricted	There are domestic laws and regulations to combat corruption but they are neither generally nor effectively enforced. Penalties can range from incarceration to payment of civil fines. There are several governmental entities in charge of fighting corruption, none have been effective in stamping out this growing problem. Many U.S. companies view corruption as a major obstacle to investment in Cote d'Ivoire. Corruption has the greatest impact on judicial proceedings, contract awards, customs, and tax issues. It is common for judges to base their decisions on financial influence. Corruption and the ongoing political/economic crisis have affected the Ivorian government's ability to attract foreign investment. Businesses have reported corruption at every level of the civil service. Some U.S. investors have raised specific concerns about the rule of law and the government's ability to provide equal protection under the law. A local company can not deduct a bribe to a foreign official from taxes.
---------------	---	---	--	--------	--------	------------	---

Democratic Republic of the Congo	Anti- Money Laundering, Anti-Corruption law Article 148bis of Penal Code	Ob-servatoire du Code d'Ethique Professionnelle OCEP (Observatory of the code of ethics of public officials), Ministry of Justice, Auditor General office	In September 2009, the Senate estimated that more than 1.2 billion dollars of gold--approximately 40 tons--was exported fraudulently from the country every year and that, in the east, 80 percent of the minerals extracted were being traded illegally	No action	No action	No report	U.S. businesses often complain about corruption in the DRC, citing it as a principal constraint to doing business in the country. The DRC was rated as the tenth most corrupt country out of 180 nations on Transparency International's 2008 Corruption Perception Index. In principle, there are legal provisions to fight and sanction corruption.. Despite these reform efforts, however, bribery is still routine in public and private business transactions, especially in the areas of government procurement, dispute settlement, and taxation. Bribery is illegal in the DRC and in principle it is investigated and prosecuted. However, law enforcement remains a challenge in this area
Equatorial Guinea	Criminal Law	Presidency and Prime Minister's Office	No corruption cases were prosecuted during 2009; In December 2008, anticorruption activist groups, including the French chapter of AI, filed a lawsuit in Paris against President Obiang and two other African heads of state, accusing them of acquiring luxury homes in France with embezzled public funds.	Signed	No action		Corruption continues to be a severe problem. No corruption cases were prosecuted during the year. Officials by law must declare their assets, although no declarations were published publicly. There was no requirement for officials to divest themselves of business interests in potential conflict with official responsibilities, and no law prohibiting conflict of interest. Most ministers continued to moonlight and conduct businesses they conflated with their government responsibilities.
Eritrea	No specific law, or criminal prosecution	None	2008, there were unconfirmed reports of more serious corruption among military leaders involving illicit trade and the appropriation of houses.	Ratified	Ratified	No report	Eritrea has historically been known as a country with low corruption, but there are indications that corruption does exist.

Ethiopia	The Federal Ethics and Anti-corruption Commission Establishment Proclamations No. 235/2001 and No. A33/2005, Criminal Code 2004	Federal Ethics and Anti-corruption Commission (FEAC), Office of the Ombudsman, Auditor General	March 2010, Dagnachew Kassa, former head of the Administration and Finance Department of the Supreme Court, is sought for a corruption allegation involving over a million Birr worth of illegal purchases of file folders in violation of supply rules	Ratified	Ratified	Article 444 of the Criminal Code, Proclamation No.414/2004 provides legal protection of whistleblowers.	The World Bank's 2008 Worldwide Governance Indicators reflected that corruption remained a serious problem. A combination of social pressure, cultural norms, and legal restrictions somewhat limited corruption. However, government officials appeared to manipulate the privatization process, and state- and party-owned businesses received preferential access to land leases and credit.
Gabon	Act No.002/2003 instituting a Prevention and Repression System against Illegal Enrichment, Act No.0003/2003 Against Unlawful Enrichment	Commission to Combat Illicit Enrichment, Federal Ethics and Anti-Corruption Commission (FEACC)	October 2009, President Ali Bongo Ondimba recalled and ordered the arrest of Philibert Andzembe, the governor of the Central Bank of Central African States, on corruption charges. The government arrested two other officials on the same corruption charges, although the charges against one were dropped. The other accused individuals were under house arrest at year's end. President Ali Bongo Ondimba's chief of staff resigned amid corruption charges associated with the scandal.	Ratified	Ratified	Restricted	There is a lack of accountability and oversight in the government's budget process, which can be seen in other areas of the country's economy. Companies have complained of a lack of transparency in customs and other government administrative affairs. During the past year, there has been an increase in anti-corruption activity on the part of members of civil society. Specifically, several local non-governmental organizations have targeted alleged corruption on the part of high-level government officials, including the President and several Ministers.

Gambia	Criminal Law, Anti-Money Laundering and Counter Terrorism Financing (AML/CFT)	Anti-Corruption Commission, Financial intelligence unit	November 2009, six judiciary officials, were suspended without pay on allegations of embezzlement of court fines, forfeitures, and auctions. Also, Lieutenant Colonel Gibril Bojang, former commander of the presidential guard, was convicted on charges of theft and sentenced to two years' imprisonment and a fine of 1,110,086 dalasis (\$41,100).	Ratified	No action	Restricted	The World Bank's worldwide governance indicators reflected that corruption was a serious problem. The president often spoke against corruption, and leading political and administrative figures faced harsh sentences on charges of corruption and wrongdoing.
Ghana	Criminal Code, Anti-Money Laundering Act 2008, Public Procurement Act 2003	Commission on Human Rights and Administrative Justice (CHRAJ), Serious Fraud Office, Economic and Organized Crime Office, The Office of Accountability, Ghana Audit Service, Public Procurement Authority	In October 2009, the former minister of foreign affairs and former chief executive of the National Investment Bank were indicted on corruption charges for activities that occurred during the previous government. There were reports that government officials pressured businesses to steer contracts toward favored companies and individuals.***	Ratified	Ratified	Whistleblower Act 2006	Corruption in Ghana is comparatively less prevalent than in other countries in the region. However, a few U.S. firms have identified corruption as the main obstacle to foreign direct investment. There is a growing perception in Ghana that government-related corruption is on the rise. However, since 2006, Ghana's score and ranking on the Transparency International Global Corruption Perceptions Index has improved slightly.

Guinea	Money Laundering Act 2003; the Financial Institution Act 2003	Anti Corruption Commission, Public Investment and Control Institutions Management, National Agency to Combat Corruption and Improve Ethical Conduct in Economic and Financial Activities (ANLC)	August 2010, Gambia's former ambassador to France, and permanent secretary at the foreign ministry, William John Joof was charged with corruption and theft relating to abuse of power while he was in office. In March 2009, four former ministers of mines-- Ousman Sylla, Louceny Nabe, Ahmed Tidiane Diallo, and Ahmed Kante-- were arrested for alleged mismanagement of the government's mining fund.	No action	Signed	Protected	Poor governance, which includes corruption, is the most significant barrier to investment in Guinea. The business and political cultures, along with poor salaries, combine to encourage corruption. Business is routinely conducted through the payment of bribes rather than by the rule of law. Though it is illegal to pay bribes in Guinea, there is no enforcement. In practice, it is difficult and time-consuming to conduct business without paying bribes, which as they must comply with the Foreign Corrupt Practices Act, leaves U.S. companies at a disadvantage.
Guinea-Bissau	Criminal Code 1993 - Decreto-Lei no. 4/93 AprovaCodigo Penal Boletim Oficial Republica da Guine-Bissau	Committee against Corruption	2009, Several members of the administrative and financially autonomous FISCAP agency in the Ministry of Fisheries were arrested for embezzlement. However, at year's end no one had been formally charged nor was anyone in custody in connection with this case.	No action	Ratified	Protected	Official corruption and lack of transparency were endemic at all levels of government. Members of the military and civilian administration reportedly assisted international drug cartels by providing access to the country and its transportation facilities. Customs officers frequently accepted bribes for not collecting import taxes, which greatly reduced government revenues. The largely nonfunctional and corrupt judiciary was unable and unwilling to enforce the law and investigate corruption cases. The World Bank's Worldwide Governance Indicators reflect that corruption was a severe problem.

Kenya	Anti-Corruption and Economic Crimes Act 2003, Public Officers Ethics Act 2003, Proceeds of Crime and Money Laundering Bill, Finance Act 2006, Service Commissions Act, Public Procurement and Disposal Act 2005	Kenya Anti-Corruption Commission (KACC), Controller and Auditor General of the Kenya National Audit Office, Public Complaints Standing Committee, Public Procurement Oversight Authority	Goldenberg Affair - A key suspect in Kenya's biggest ever corruption scam said he got ex-president Daniel arap Moi involved in this gold and diamond re-export plan. Kamlesh Pattni, a major shareholder of Goldenberg, told the inquiry into the scandal that Mr Moi was keen to earn foreign currency for Kenya. Mr Moi denies any part in the affair, in which Kenya lost up to \$600m between 1990 and 1993. Kenyan court of appeal judge Samuel Bosire has closed the government probe into the matter.;	Ratified	Ratified	Anti-Corruption and Economic Crimes Act 2003, Witness Protection Act 2006	The IFC's 2007 "Investment Climate Assessment for Kenya" reported that corruption was rated as a "severe" or major obstacle by three-quarters of the firms interviewed. Two-thirds of respondents stated they were expected to pay bribes for government contracts.
Lesotho	Prevention of Corruption and Economic Offences Act, Criminal Procedure and Evidence	Directorate on Corruption and Economic Offences, Auditor General	July 2000, a dozen major international dam-building companies involved in the World Bank funded Lesotho Highlands Water Project (LHWP) in Southern Africa had lavishly bribed at least one top official on the project, allegedly giving nearly US\$2 million in bribes over ten years.	Ratified	Ratified	Restricted	Investors reported that corruption is not a significant factor for foreign investors. Anti-corruption legislation was passed in 1999 and is being implemented through the creation of an autonomous anti-corruption unit.

Liberia	Penal Code, Anti-Corruption Act 2008	Liberia Anti-Corruption Commission, Ministry of Justice	Mr. J.D Slinger was a Commissioner in the Bureau of Maritime Affairs. He was suspended on charges of Financial Impropriety and charged with economic sabotage for embezzling about \$ 3.5 million dollars. While on bail Slinger fled the country and is still at large.	Ratified	Accession	None	The government is tackling corruption, but it remains systemic. In 2008, Transparency International rated Liberia 138th of 179 countries on its corruption perception index, up from 150th place the previous year. The Mo Ibrahim African governance index showed Liberia as "most improved" in 2008, and in the 2008 World Bank Worldwide Governance Indicator Liberia showed more improvement over the past two years in "control of corruption" than any other country in the world. Although corruption is being addressed, travelers may encounter officials who solicit bribes (often euphemistically referred to as "cold water" or "my Christmas").
Madagascar	Criminal Code	Bureau Indépendant Anti-Corruption (Anti-Corruption Bureau), SAMIFIN (anti-money laundering agency)	2007Seventeen persons were arrested in connection with the embezzlement of 10.8 billion ariary (approximately \$5.4 million) from the Central Bank in Manakara; the director of the Central Bank and two of his staff subsequently left the country to avoid arrest. At their trial in April, four were acquitted, 10 were released for lack of evidence, and six (including the director, in his absence) were given sentences up to 15 years' imprisonment and fines up to 20 million ariary (approximately \$10,000).	Ratified	Ratified	Restricted	Complicated administrative procedures introduce delays, uncertainties and multiply the possibilities for corruption. Combating corruption is a stated priority of the Malagasy government and senior officials appear to be taking that effort seriously. Giving or accepting a bribe is a criminal act and is sentenced by court.

Malawi	Corrupt Practices Act 1995, Penal Code, Assets Bill 2002, Money Laundering, Proceeds of Serious Crime and Terrorist Financing Act	Anti-Corruption Bureau (ACB), the Ministry of Trade and Private Sector Development, the Office of the Director of Public Procurement, Business Action Against Corruption (BAAC), Office of the Ombudsman, Auditor General	February 2010, Former Malawi President Bakili Muluzi was arrested on 26 February and initially charged with 86 counts of corruption and abuse of office. He is being accused of allegedly diverting 1.7 billion Malawi Kwacha (about US \$11m [€8.6m]) of donor money into his personal account.	Ratified	Ratified	The Corrupt Practices Act 1995 provides for protection	Although progress has been made addressing the issue, corruption continues to be viewed as a major obstacle to doing business in Malawi. There have been serious allegations of corruption, particularly in the area of customs and excise tax, traffic police, immigration and government procurement. Giving or receiving a bribe -- whether to or from a Malawian or foreign official -- is a crime under section 90 of Malawi's penal code.
Mali	Anti-Corruption Law (in French), the Law Against Crimes of Illicit Enrichment (in French), Penal Code in 2001	Support Unit to the Control Structures of the Administration (CASCA), Auditor General	September 2008, Ahmed Sow, resigned from his position as minister of energy, mines, and water due to corruption allegations stemming from his previous role as the director of the EU's Center for Business Development.	Ratified	Ratified	None	Corruption is considered a crime punishable under the penal code. This notwithstanding, there are widely circulated reports of bribery cases on large contracts and investment projects. Corruption poses an obstacle to FDI. Government officials often solicit bribes in order to complete otherwise routine procedures. Using assessments by the African Development Bank, the World Bank, and the World Economic Forum, Transparency International assigned Mali a score of 3,1 on a 10 to 0 scale, zero representing the lowest score. Corruption seems most pervasive in government procurement and dispute settlement. Paying government procurement agents a five to ten percent commission is common practice.
Mauritius	Prevention of Corruption Act 2002 (amended 2006)	Independent Commission against Corruption, Financial Intelligence Unit	On September 26, 2009, L'Express reported that the ICAC arrested the director of the National Art Gallery for bribing the board chairman to reappoint him as director; he was later released on bail.	Signed	Ratified	Protected	Mauritius is one of Africa's least corrupt countries. Although, overall Mauritius did well in 2008, the TI survey highlighted the highly-publicized dismissal of the former Director of Customs who earlier made allegations of continued high-levels of corruption in the Customs Department. Corruption, however, is not seen as an obstacle to foreign direct investment.

Mozambique	Anti-Corruption Law 2004, Law on Money Laundering 2002 (supplemented by Decree 37/2004), Public Procurement Law	Central Office for Combating Corruption (within Attorney General's Office), Administrative Tribunal (Auditor), Ombudsman's Office, Functional Unit for Procurement Supervision	In March 2009, the investigating magistrate, Octavio Chumba, threw out 48 of the 49 charges against former interior minister Almerino Manhenje, reducing the damages sought from 322 million meticaais (\$12.3 million) to 500,000 meticaais (\$19,000). Manhenje had been charged in September 2008 with embezzlement of 211 million meticaais (\$8.3 million) of state money. Former president Chissano had publicly urged leniency, noting that others had committed worse offenses and remained at liberty; Carlos Cardoso was shot dead in central Maputo while investigating a US\$14 million fraud connected with the privatization of Mozambique's largest bank.***	Ratified	Ratified	Anti-Corruption Law 2004	The World Bank's Worldwide Governance Indicators reflected that corruption was a serious problem, with no change in ranking from 2007. Mozambique's ranking dropped for the first time in 5 years, indicating that corruption in the country is "rampant." Corruption and extortion by police were widespread, and impunity remained a serious problem
------------	---	--	---	----------	----------	--------------------------	--

Namibia	Anti-Corruption Act 2003, Tender Board of Namibia Act 16 of 1996	Anti-Corruption Commission, Office of the Auditor General Namibia, Office of the Ombudsman, Tender Board of Namibia	ACC agents arrested the Deputy Director of the Ministry of Environment and Tourism, Sackey Namugongo, on charges of fraud running into hundreds of thousands of dollars. Magistrate Judge Sarel Jacobs sentenced Namugongo to ten years' imprisonment, of which two years were suspended for a period of five years on condition he is not again convicted of corruption committed during the period of suspension.	Ratified	Ratified	Anti-Corruption Act 2003	Transparency International ranked Namibia 61 out of 180 countries in its 2008 corruption perceptions index. The Namibian Government has adopted a policy of "zero tolerance" for corruption. Anti-corruption legislation is in place to combat public corruption. Critics of the anti-corruption campaign charge that the Anti-Corruption Commission narrowly interprets its mandate and focuses on minor cases, with few cases reaching prosecution.
Niger	Criminal Code	Réseau Parlementaire de Lutte contre la Corruption (Parliamentary Network for the Fight Against Corruption), Fight Against Economic and Financial Delinquency (agency set up by current junta)	August 2010, former finance minister Ali Lamine Zene with corruption for suspected embezzlement. The case was brought by arrested after a case was made against him by the Commission to Fight Against Economic and Financial Delinquency.	Ratified	Ratified	Protected	Official corruption occurs, and the Government publicly acknowledges that it is a problem and is making efforts to address it. The problem of corruption is compounded by a poorly financed and trained law enforcement system and weak administrative controls. Bureaucratic processes are slower than American standards, but this is due more to inefficiency and lack of information technology than to corruption.

Nigeria	Corrupt Practices and Other Related Offenses Act 2000, Money Laundering (Prohibition) Act 2004, Advance Fee Fraud and other Fraud Related Offenses Act 2006, Fiscal Responsibility Act 2007, Nigerian Constitution 1999, Code of Conduct Bureau and Tribunal Act 1999, Public Procurement Act 2007, Nigerian Extractive Industries Transparency Initiative Bill 2007, Nigerian Code of Corporate Governance	Independent Corrupt Practices and Other Related Offenses Commission, Economic and Financial Crimes Commission, Code of Conduct Bureau, Public Complaints Commission, Supreme Audit Institution, Office of the Principal Secretary to the President, Bureau of Public Procurement, Budget Monitoring and Price Intelligence Unit, Corporate Affairs Commission, Securities and Exchange Commission	In October 2009, the courts convicted the former Nigerian Ports Authority (NPA) board chairman Bode George and five other commissioners of abuse of public office in the improper awarding of contracts. George was sentenced to 30 months in prison without the option of paying a fine.; The EFCC claimed that approximately 10 former state governors were facing corruption charges in 2009; however, none of the cases had moved forward by year's end.	Ratified	Ratified	No legal protections, but commissions have internal mechanisms to protect whistleblower's identities	Domestic and foreign observers recognize corruption as a serious obstacle to economic growth and poverty reduction. Nigeria has received some positive news on the corruption front. Transparency International in 2008 noted Nigeria's improvement from being the 18th most corrupt country to 58th in its Corruption Perceptions Index. Despite improvements in the Transparency International rankings, reassignment of large numbers of key personnel in the Economic and Financial Crimes Commission (EFCC) and a lack of progress on high-level corruption cases have brought into question the government's commitment to fighting corruption. Some high profile convictions have taken place, such as the prosecution of the former governor of Bayelsa State, and the former Inspector General of Police; however, the sentences handed down have been relatively light.
---------	---	---	--	----------	----------	--	---

Rwanda	Law No. 23/2003, 2003	National Tender Board, Anti-Corruption Unit of the Rwanda Revenue Authority, Auditor's General Office, Ombudsman's Office	Theoneste Mutsindashyaka, a senior member of Rwandan Patriotic Front and then state Minister of Education, was prosecuted in 2008 for alleged embezzlement of public funds while he was a provincial governor, convicted, and sentenced to five years. Later he and 56 other senior government officials including RPF cohorts were found to have under-declared their assets and were removed from public institutions and required to refund the stolen funds; In December 2009, the court sentenced Vincent Gatwabayege, former permanent secretary in the Ministry of Infrastructure, to three years in prison for embezzlement of state funds.***	Ratified	Ratified	Protected	The Rwandan government maintains a consistent policy of combating corruption. Although documented reports of corruption are relatively infrequent, the Government is periodically confronted with allegations of misconduct by officials using their office for personal gain. In general, such incidents are investigated, prosecuted and perpetrators punished when found guilty. Enforcement is the same for both foreign and local investors. The Parliament takes an active role in investigating public officials accused of corruption. Some businesses report occurrences of petty corruption in the customs clearing process, but there are limited reports of corruption in transfers, dispute settlement, regulatory system, taxation or investment performance requirements. A local company cannot deduct a bribe to a foreign official from taxes. A bribe by a local company to a foreign official is a crime in Rwanda.
--------	-----------------------	---	--	----------	----------	-----------	---

Sao Tome and Principe	Anti-corruption law, Criminal Code, Anti-Money Laundering Act, 2008	Financial Intelligence Unit, The Auditor-General, Ombudsman's Office	2008, several high-level officials, including one former prime minister, were questioned regarding their alleged involvement in the disappearance of millions of dollars from the government's foreign aid fund. The trial resumed on January 30. No high-level officials were tried as they have expansive immunity. However, two administrative officials were convicted and sentenced to nine and seven years in prison, respectively.	Signed	Ratified	No report	Corruption has increased during the past decade in step with greater economic development, and mainly consists of bribery, embezzlement, and mismanagement of public funds.
-----------------------	---	--	---	--------	----------	-----------	---

Senegal	Criminal Code, Penal Code	Commission Nationale de Lutte Contre la non Transparence, le Corruption et la Concussion, Cellule Nationale de Traitement des Information's Financieres du Senegal, General Economics, Finances, Plan and Economic Cooperation Committee, Inspection Generale d'Etat, Government Audit Office, Mediateur de la Republique, Autorite de Regulation des Marches Publics, Commission Nationale des Contrats de l'Administration	Leading politicians faced corruption allegations when they began to challenge the president's dominance within the PDS, the president's political party. Idrissa Seck was dismissed as prime minister in 2004 based on accusations of embezzlement and threatening national security, and former National Assembly president Macky Sall was questioned by police about potential money laundering in January 2009. While all charges against Seck were finally dropped in May 2009 and he began working to reclaim his place in the ruling party, Sall formally resigned from the PDS in 2008, costing him both his seat in the parliament and his position as mayor of Fatick.	Ratified	Ratified	UNCAC	The potential for corruption is a significant obstacle for economic development and competitiveness in Senegal, in spite of the country's anti-corruption laws, regulations, penalties, and agencies. Credible allegations of corruption have been made concerning government procurement, dispute settlement, and decisions by the judiciary and regulatory and enforcement agencies. Transparency International, in its 2008 Perceptions of Corruption Index, ranked Senegal 85 out of 180 countries.
Seychelles	Anti-Money Laundering Act 2006, Criminal Code	Ombudsman's Office	Radovan Krejcir, billionaire native Czech charged with corruption was granted citizenship to Seychelles, dealing in the circle around the then president, France-Albert René. Krejcir escaped with his family to Seychelles, which has no extradition agreements with the Czech Republic. When things got sour with Rene, Krejcir was forced to seek Asylum in South Africa.	Ratified	Ratified	No report	The World Bank's 2009 Worldwide Governance Indicators reflected that corruption was a problem. There were reports of rewards to People's Party supporters in the form of job assistance, land distribution, free building materials, and monetary payments.

Sierra Leone	The Anti-Money Laundering Act, 2005, The Anti Corruption Act, 2008	Anti-Money Laundering Authority, Anti Corruption Commission	April 2010, Afsatu Kabba, the then-Minister of Fisheries and Marine Resources, was charged on 17-counts of indictment for graft and abuse of office. In March, Sheku Tejan Kamara, who was heading the Health and Sanitation ministry was found guilty of awarding contracts to his cronies without opening them up to public tender. He was sentenced to five years imprisonment, but avoided jail by paying the alternative fine of \$40,000.	Ratified	Ratified	Protected	International companies identify corruption as an obstacle to investment, ranking Sierra Leone near other West Africa countries for corruption. Bribes, kickbacks, extortion, and skimming on contracts and payments are common forms of corruption. The Anti-Corruption Act is not used disproportionately against foreigners.
--------------	--	---	---	----------	----------	-----------	---

Somalia	No specific law, or criminal prosecution	(Talks of setting up a Anti-Corruption Commission, not in effect as yet)	Local media in southern Somalia do not have access to the information that could potentially incriminate government officials who are involved in corruption and graft. What information there is comes in the form of political accusations by rival politicians against each other. It is not necessarily followed by formal investigations. On Oct. 3, 2007, Supreme Court Chief Justice Yusuf Ali Harun was arrested by presidential guards after the president publicly accused him of corruption, and voted to remove Harun from his constitutional post on charges of graft, but these allegations have never been substantiated. Harun was released after months in detention.	Signed	No action	Article 250, Somali Penal Code protects civil servants	Corruption existed in almost every transaction in the country, and there is no regulatory or penal framework in place to combat it. This is true even in the provision of humanitarian assistance. The 2009 World Bank Worldwide Governance Indicators reflected that corruption was a severe problem.
---------	--	--	--	--------	-----------	--	--

South Africa	Prevention and Combating of Corruption Act 2004, Public Finance Management Act of 1999, Promotion of Access to Information Act 2000, Code of Conduct for Assembly and Permanent Council Members, Framework for Supply Chain Management	Special Investigating Unit (SIU), the Auditor-General, the Public Protector (Ombudsman), the Public Service Commission, the South African Police Service (SAPS), and the National Prosecuting Authority (NPA), South African revenue Service, International Complaints Directorate, the Scorpions (dissolved)	Investigations by the Scorpions led to the 2005 conviction of businessman Schabir Shaik, President Jacob Zuma’s financial adviser, on charges of paying Zuma a series of bribes totaling about US\$170,000 to secure the success of contract bids by French arms manufacturer Thint; In an arms deal case, former ANC chief whip Tony Yengeni was convicted of corruption and lost his parliamentary seat, but won parole in January 2007 after serving only five months of a four-year prison sentence.	Ratified	Ratified	Protected Disclosures Act	High rates of violent crime are a strain on capacity and make it difficult for South African criminal and judicial entities to dedicate adequate resources to anti-corruption efforts. Parliament voted to disband the South African Police Anti-Corruption Unit and the Directorate for Special Operations (more popularly known as the “Scorpions”) and fold its jurisdiction into the National Police in October 2008. South Africa was the second least corrupt country in Africa in 2007; it was the fourth least corrupt country in Africa in 2008. Public perception of widespread official corruption, particularly in the police and the Department of Home Affairs, continued.
--------------	--	---	--	----------	----------	---------------------------	--

Swaziland	Prevention of Corruption Act 2008, The Money Laundering (Prevention) Act 2001, Criminal Code	Anti-Corruption Commission	In 2006 the government commissioned Pricewaterhouse Coopers to conduct a forensic investigation of the Department of Customs and Excise and the Department of Income Tax. The investigation report found that the computer user identifications of seven customs officials had been used to manipulate data to undercharge importers by approximately \$4 million (28.5 million emalangeni). The report recommended disciplinary hearings for several Department of Income Tax employees and the banning of several companies from eligibility for government tenders.	Signed	Signed	Protected	Corruption is not considered a significant obstacle to FDI.
Tanzania	Prevention and Combating of Corruption Act 2007, Public Leadership Code of Ethics, Public Finance Act, Public Procurement Act	Prevention and Combating of Corruption Bureau, Commission for Human Rights and Good Governance, Ethics Commission, Controller and Auditor General, Tanzania Revenue Authority, Public Procurement Regulatory Authority	According to the PCCB, 137 new cases were submitted to the courts during 2009 and 409 old and new cases prosecuted. As of August 2009, there had been 25 convictions and 40 acquittals; In May 2009, a district magistrate was sentenced to 11 years in prison for demanding five million Tanzanian shillings (\$3,700) from a businessman in return for a favorable judgment in his case.	Ratified	Ratified	Prevention and Combating of Corruption Act 2007	Corruption remains a major concern for foreign investors. While giving or receiving a bribe (including bribes to a foreign official) is a criminal offense in Tanzania, the enforcement of laws, regulations and penalties to combat corruption has largely been ineffective.. Some areas where corruption persists include government procurement, privatization, taxation, ports, and customs clearance. The Customs Department, the Port Authority, and the Tanzania Revenue Authority (TRA) remain a great hindrance to importers throughout Tanzania. Unpredictable and lengthy clearance delays and bribes to expedite service are commonplace.

Togo	Loi Relative a la Lutte Contre Le Blanchiment de Capitaux(Anti Money Laundering), Penal Code	Ministry of Justice, Anti-Corruption Committee	In 2007, corruption allegations levied by the Anti-Corruption Committee against the director general of the Social Security Agency was brought before court.	Ratified	Ratified	Restricted	Although Togo has laws on the books that make corruption a crime, it has spread as a business practice in recent years. Government procurement contracts and dispute settlements are more likely to go forward after palms are greased. Giving a bribe, whether to private or government officials, is considered a crime but is often expected.
Uganda	Anti-Corruption Bill 2009, Penal Code, Inspectorate of Government Act 2002, Public Finance and Accountability Act 2003, Leadership Code Act 2002, Public Procurement and Disposal of Public Assets Act 2003, Code of Conducts and Ethics	Inspectorate of Government, Directorate of Public Prosecutions, Anti-Corruption Court, Directorate of Ethics and Integrity, Inter Agency Forum, Auditor General, Uganda Human Rights Commission, Public Procurement and Disposal of Public Assets Authority	On November 15, 2009, a court in Mbarara convicted grade II magistrate Moses Ndifuna of abuse of office for soliciting and receiving a 190,000 shilling (\$100) bribe. Ndifuna, who was sentenced to two years' imprisonment and ordered to refund the money, was released on bail in December pending hearing of his appeal; An army tribunal sentenced a former commander, Major General James Kazini, to three years in prison for stealing funds directed to nonexistent soldiers. He remained free on bail during his appeal.***	Ratified	Ratified	Inspectorate of Government Act	Widespread corruption damages a business environment that would otherwise provide a fairly level playing field for foreign investors. The nature of corruption in Uganda is complex. While outright bribe-taking (and requesting) does exist, the misappropriation of government funds and assets, graft, influence peddling, and the flouting of public procurement procedures also occur. Foreign businesses are not specifically targeted for bribes and payoffs; nor are they immune. American firms have noted some difficulties due to lack of transparency and possible collusion between competing business interests and government officials in tendering processes. Reportedly, some foreign businesses have been urged to take on prominent local partners. Government procurement, particularly for defense items, is not transparent. Some American firms, which are bound by the U.S. Foreign Corrupt Practices Act, suspect they have lost tenders to bidders from countries which have not criminalized the paying of bribes to foreign officials.

Zambia	Prohibition and Prevention of Money Laundering Act 2001, Anti-Corruption Commission (ACC) Act 1996	Anti-Corruption Commission (ACC), The Task Force on Economic Plunder (TFEP), The Auditor-General, The Commission for Investigations (CI)	In 2003, Mwanawasa commenced investigations against his predecessor, former President Chiluba, who had his immunity stripped and was then arrested. Chiluba was charged with corruption committed during his term in office in accordance with 168 counts of theft totalling more than USD 40 million of public money. Chiluba's trial started in 2003 and came to an end in August 2009, when he was acquitted from all charges. However, his co-accused were convicted for stealing public funds and were sentence 3 years in prison.	Ratified	Ratified	None	Petty corruption remains common, as low salaries for government employees undermine efforts at reform, and extensive regulations create opportunities for bribes. The issuance of land titles has been singled out as a process particularly susceptible to corruption.
Zimbabwe	Anti-Corruption Commission Act 13/2004, Criminal Law Act 23/2004	Anti-Corruption Commission	February 2010, Discovery of mass-scale and systematic looting of resources by Local Councillors of the Chitungwiza Town Council in Zimbabwe. The Councillors have been implicated in illegal and corrupt sale of housing stands and the rampant barter exchange of housing stands for vehicles.	Ratified	Ratified	Prevention of Corruption Act, Chapter 9:16, Section 14 (2) protects whistleblowers	There is widespread corruption in government. Implementation of the government's ongoing redistribution of expropriated commercial farms has substantially favored the ruling party elite and continues to lack transparency. Government officials and police lack sufficient political backing at senior levels of the government to effectively investigate corruption cases. The government prosecutes individuals selectively, focusing on those who have fallen out of favor with the ruling party and ignoring transgressions by members of the favored elite.